UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

IN RE NEW ENGLAND COMPOUNDING PHARMACY, INC. PRODUCTS LIABILITY LITIGATION

MDL No. 2419 Dkt. No. 1:13-md-2419-RWZ

THIS DOCUMENT RELATES TO:

All Actions

MEDICAL SALES MANAGEMENT, INC'S JOINDER IN AMERIDOSE, LLC'S AND GDC PROPERTIES MANAGEMENT, LLC'S MOTIONS FOR LEAVE TO REPLY TO THE TENNESSEE CLINIC DEFENDANTS' JOINDER IN THE PSC'S MOTION TO PARTIALLY LIFT THE DISCOVERY STAY

Medical Sales Management, Inc. ("MSM") hereby joins in and incorporates by reference Ameridose, LLC's ("Ameridose") and GDC Properties Management, LLC's ("GDC") Motions for Leave to Reply to the Tennessee Clinic Defendants' Joinder in the PSC's Motion to Partially Lift the Discovery Stay ("Motions for Leave"). (Dkt. Nos. 1046, 1053.)

Wherefore, MSM requests that this Honorable Court grant MSM the identical relief sought by GDC and Ameridose in their Motions for Leave.

Respectfully submitted,

Medical Sales Management, Inc. By its attorneys,

/s/ Daniel M. Rabinovitz

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CERTIFICATE OF SERVICE

I hereby certify that on April 3, 2014, a true copy of the foregoing was filed in accordance with the Court's Electronic Filing Guidelines and will be sent to all counsel of record by operation of the Court's electronic filing system.

/s/ Daniel M. Rabinovitz